

Submitter: Brendan Mortimer
On Behalf Of:
Committee: House Committee On Transportation
Measure, Appointment or Topic: HB4085

Dear Members of the Committee,

I am writing as a private citizen and Oregon resident in support of HB 4085, with amendments.

Oregon has lacked an AV regulatory framework for nearly a decade despite the 2018-2021 Task Force producing comprehensive recommendations. HB 4085 addresses this gap by resolving legal ambiguities around what constitutes a "driver," creating a deployment pathway (not just testing), and establishing requirements for first responder interactions. I support these goals

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The case for autonomous vehicles is straightforward: human drivers kill approximately 40,000 Americans every year. Motor vehicle crashes are the leading cause of death for Americans aged 5 to 24—not cancer, not heart disease, not guns. For children and young adults, cars are the single deadliest thing in their environment. Human error is a factor in roughly 95% of these crashes.

This is not inevitable. Properly deployed autonomous vehicles offer another path to similar reductions: computers don't drink, don't text, don't get drowsy, and don't run red lights out of impatience.

To be clear, "properly deployed" is key. Autonomous vehicles are not inherently safe—they are as safe as their engineering and regulatory oversight make them. That is why the amendments I propose below matter. But the underlying technology, well-regulated, has the potential to dramatically reduce the toll of traffic violence in Oregon. We should want it to succeed.

I believe the bill as written is directionally correct but has significant gaps that should be addressed before passage:

1. Increase minimum liability coverage (Section 8)

The bill requires \$1 million in combined single-limit liability coverage. California requires \$5 million. Washington requires \$5 million for driverless testing. Oregon's own 2019 Task Force recommended \$5 million. I urge the committee to align Oregon's requirement with these standards.

2. Strengthen enforcement authority (Section 12)

Under the current text, ODOT can only suspend or revoke authorization when a vehicle is not in safe operational condition and operation creates a substantial risk of death or has already caused death or serious injury. This threshold is too high. ODOT should have authority to act on patterns of traffic violations, failure to maintain required insurance, or failure to submit required reports—not only after a catastrophic safety failure has occurred.

Additionally, authorizations should not be indefinite. A periodic renewal requirement would ensure ongoing compliance verification.

3. Require meaningful data transparency (Section 7)

The bill only requires operators to forward NHTSA collision reports to ODOT. California requires quarterly public reporting on disengagements, operational metrics, and incidents. Oregon should require, at minimum: vehicle miles traveled disaggregated by vehicle; trip counts with origin/destination by census tract; all incidents including collisions, citations, and stoppage events; and fleet support response times.

I have no objection to the state preemption provisions in Section 13. State-level regulation is the standard approach in every jurisdiction where commercial robotaxi service operates today, and a unified regulatory framework is preferable to a patchwork of local requirements.

I urge the committee to pass HB 4085 with these amendments. Thank you for your consideration.

Brendan Mortimer
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